United Water Spfld. Inv# 83340

CHAIN OF CUSTODY RECORD

[redacted]

Sampled by (print): OPS / John Colburn
Sampled by (signature): John Colburn
Sample Type: 2241 – Press Cake

Describe sample location:

Laboratory I.D.#	Sample Collection Period Start Date/Time	Stop Date/Time	GRAB	COMP	pH*	Analysis Requested	Preservative
2241	10/19/04 2600	10/20/04 0600				Full TCLP	Refrig.
24B35463-64-65						VOC + Semi VOC	

Relinquished By	Date	Time	Received By
John Colburn print: John Colburn	10/22/04	1:05 PM	print: Lisa Veratti Dagnoli
print:			print:
print:			print: (nis)
print:			print: Full TCLP plus VOC + Semi's

Comments: * sludge, press cake is Matrix
sample has TCLP ~~+ etc~~ VOC + Semi VOC (nis)

* pH on site prior to preservation
Budget Account Number:

B.7. Land Application of Bulk Sewage Sludge. (con't)

b. Do you identify all land application sites in Section C of this application? _____ Yes _____ No

If no, submit a copy of the land application plan with application (see instructions).

c. Are any land application sites located in States other than the State where you generate sewage sludge or derive a material from sewage sludge? _____ Yes _____ No

If yes, describe, on this form or another sheet of paper, how you notify the permitting authority for the States where the land application sites are located. Provide a copy of the notification.

_____

_____

Complete Section B.8 if sewage sludge from your facility is placed on a surface disposal site.

B.8. Surface Disposal.

a. Total dry metric tons of sewage sludge from your facility placed on all surface disposal sites per 365-day period: _____ dry metric tons

b. Do you own or operate all surface disposal sites to which you send sewage sludge for disposal?

_____ Yes _____ No

If no, answer B.8.c through B.8.f for each surface disposal site that you do not own or operate. If you send sewage sludge to more than one such surface disposal site, attach additional pages as necessary.

c. Site name or number _____

d. Contact person _____

Title _____

Telephone number _____

Contact is _____ Site owner _____ Site operator

e. Mailing address _____

_____

f. Total dry metric tons of sewage sludge from your facility placed on this surface disposal site per 365-day period: _____ dry metric tons

Complete Section B.9 if sewage sludge from your facility is fired in a sewage sludge incinerator.

B.9. Incineration.

a. Total dry metric tons of sewage sludge from your facility fired in all sewage sludge incinerators per 365-day period: 979 dry metric tons

b. Do you own or operate all sewage sludge incinerators in which sewage sludge from your facility is fired? _____ Yes X No

If no, complete B.9.c through B.9.f for each sewage sludge incinerator that you do not own or operate. If you send sewage sludge to more than one such sewage sludge incinerator, attach additional pages as necessary.

c. Incinerator name or number: Veolia Water - Nagatuck

d. Contact person: Doug Ritchie

Title: Facility Manager

Telephone number: 202-723-1433

Contact is: _____ Incinerator owner X Incinerator operator

B.9. Incineration. (con't)

e. Mailing address: 500 Cherry Street
Nagatuck, CT 06770

f. Total dry metric tons of sewage sludge from your facility fired in this sewage sludge incinerator per 365-day period: _____ dry metric tons

Complete Section B.10 if sewage sludge from this facility is placed on a municipal solid waste landfill.

B.10. Disposal in a Municipal Solid Waste Landfill. Provide the following information for each municipal solid waste landfill on which sewage sludge from your facility is placed. If sewage sludge is placed on more than one municipal solid waste landfill, attach additional pages as necessary. See Attached.

a. Name of landfill (1) Chicopee Sanitary Landfill
(2) RCI Fitchburg/Westminster Landfill

b. Contact person (3) Waste Management of New Hampshire - TLR Refuse Disposal Facility

Title (4) Seneca Meadows, Inc.

Telephone number

Contact is _____ Landfill owner _____ Landfill operator

c. Mailing address _____

_____

d. Location of municipal solid waste landfill:

Street or Route # _____

County _____

City or Town _____ State _____ Zip _____

e. Total dry metric tons of sewage sludge from your facility placed in this municipal solid waste landfill per 365-day period:

_____ dry metric tons

f. List, on this form or an attachment, the numbers of all other Federal, State, and local permits that regulate the operation of this municipal solid waste landfill.

Permit Number	Type of Permit

g. Submit, with this application, information to determine whether the sewage sludge meets applicable requirements for disposal of sewage sludge in a municipal solid waste landfill (e.g., results of paint filter liquids test and TCLP test)

h. Does the municipal solid waste landfill comply with applicable criteria set forth in 40 CFR Part 258?

_____ Yes _____ No

1 103331 (CSO) and

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

C. LAND APPLICATION OF BULK SEWAGE SLUDGE

Complete Section C for sewage sludge that is applied to the land, unless any of the following conditions apply:

- **The sewage sludge meets the Table 1 ceiling concentrations, the Table 3 pollutant concentrations, Class A pathogen requirements, and one of vector attraction reduction options 1-8 (fill out B.4 instead); or,**
- **The sewage sludge is sold or given away in a bag or other container for application to the land (fill out B.5 instead); or,**
- **You provide the sewage sludge to another facility for treatment or blending (fill out B.6 instead).**

Complete Section C for every site on which the sewage sludge that you reported in Section B.7 is applied.

C.1. Identification of Land Application Site. NA

a. Site name or number _____

b. Site location (Complete 1 and 2).

1. Street or Route # _____

County _____

City or Town _____ State _____ Zip _____

2. Latitude _____ Longitude _____

Method of latitude/longitude determination

_____ USGS map _____ Field survey _____ Other

c. Topographic map: Provide a topographic map (or other appropriate map if a topographic map is unavailable) that shows the site location.

C.2. Owner Information.

a. Are you the owner of this land application site? _____ Yes _____ No

b. If no, provide the following information about the owner:

Name _____

Telephone number _____

Mailing Address _____

_____

C.3. Applier Information.

a. Are you the person who applies, or who is responsible for application of, sewage sludge to this land application site?
_____ Yes _____ No

b. If no, provide the following information for the person who applies:

Name _____

Telephone number _____

Mailing Address _____

_____

C.4. Site Type: Identify the type of land application site from among the following.

_____ Agricultural land _____ Forest _____ Public contact site
_____ Reclamation site _____ Other. Describe: _____

C.5. Crop or Other Vegetation Grown on Site.

a. What type of crop or other vegetation is grown on this site?

_____

b. What is the nitrogen requirement for this crop or vegetation?

_____

C.6. Vector Attraction Reduction.

Are any vector attraction reduction requirements met when sewage sludge is applied to the land application site?
_____ Yes _____ No

If yes, answer C.6.a and C.6.b;

a. Indicate which vector attraction reduction option is met:

_____ Option 9 (Injection below land surface)
_____ Option 10 (Incorporation into soil within 6 hours)

b. Describe, on this form or another sheet of paper, any treatment processes used at the land application site to reduce vector attraction properties of sewage sludge:

_____

_____

Complete Question C.7 only if the sewage sludge applied to this site since July 20, 1993, is subject to the cumulative pollutant loading rates (CPLRs) in 40 CFR 503.13(b)(2).

C.7. Cumulative Loadings and Remaining Allotments.

a. Have you contacted the permitting authority in the State where the bulk sewage sludge subject to CPLRs will be applied, to ascertain whether bulk sewage sludge subject to CPLRs has been applied to this site on or since July 20, 1993? _____ Yes _____ No

If no, sewage sludge subject to CPLRs may not be applied to this site.

If yes, provide the following information:

Permitting authority _____

Contact Person _____

Telephone number _____

b. Based upon this inquiry, has bulk sewage sludge subject to CPLRs been applied to this site since July 20, 1993?
_____ Yes _____ No

If no, skip C.7.c.

M 03331 (CSO) and

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

c. Provide the following information for every facility other than yours that is sending, or has sent, bulk sewage sludge to CPLRs to this site since July 20, 1993. If more than one such facility sends sewage sludge to this site, attach additional pages as necessary.

Facility name _____

Mailing Address _____

_____

Contact person _____

Title _____

Telephone number _____

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewsater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

D. SURFACE DISPOSAL

Complete this section if you own or operate a surface disposal site.

Complete Sections D.1 - D.5 for each active sewage sludge unit.

D.1. Information on Active Sewage Sludge Units.

a. Unit name or number: _____

b. Unit location (Complete 1 and 2).

1. Street or Route # _____

   County _____

   City or Town _____ State _____ Zip _____

2. Latitude_____ Longitude_____

   Method of latitude/longitude determination: _____ USGS map _____ Field survey _____ Other

c. Topographic map. Provide a topographic map (or other appropriate map if a topographic map is unavailable) that shows the site location.

d. Total dry metric tons of sewage sludge placed on the active sewage sludge unit per 365-day period: _____ dry metric tons

e. Total dry metric tons of sewage sludge placed on the active sewage sludge unit over the life of the unit: _____ dry metric tons

f. Does the active sewage sludge unit have a liner with a maximum hydraulic conductivity of 1×10^{-7} cm/sec? _____ Yes _____ No

If yes, describe the liner (or attach a description):

_____

_____

g. Does the active sewage sludge unit have a leachate collection system? _____ Yes _____ No

If yes, describe the leachate collection system (or attach a description). Also describe the method used for leachate disposal and provide the numbers of any Federal, State, or local permit(s) for leachate disposal:

_____

_____

h. If you answered no to either D.1.f. or D.1.g., answer the following question:

Is the boundary of the active sewage sludge unit less than 150 meters from the property line of the surface disposal site?
_____ Yes _____ No

If yes, provide the actual distance in meters: _____

Provide the following information:

Remaining capacity of active sewage sludge unit, in dry metric tons: _____ dry metric tons

Anticipated closure date for active sewage sludge unit, if known: _____ (MM/DD/YYYY)

Provide, with this application, a copy of any closure plan that has been developed for this active sewage sludge unit.

D.2. Sewage Sludge from Other Facilities. Is sewage sent to this active sewage sludge unit from any facilities other than your facility?

_____ Yes _____ No

If yes, provide the following information for each such facility. If sewage sludge is sent to this active sewage sludge unit from more than one such facility, attach additional pages as necessary.

a. Facility name _____

b. Mailing Address _____

_____

c. Contact person _____

Title _____

Telephone number _____

d. Which class of pathogen reduction is achieved before sewage sludge leaves the other facility?

_____ Class A _____ Class B _____ None or unknown

e. Describe, on this form or another sheet of paper, any treatment processes used at the other facility to reduce pathogens in sewage sludge:

_____

_____

f. Which vector attraction reduction option is met for the sewage sludge at the receiving facility?

_____ Option 1 (Minimum 38 percent reduction in volatile solids)
_____ Option 2 (Anaerobic process, with bench-scale demonstration)
_____ Option 3 (Aerobic process, with bench-scale demonstration)
_____ Option 4 (Specific oxygen uptake rate for aerobically digested sludge)
_____ Option 5 (Aerobic processes plus raised temperature)
_____ Option 6 (Raise pH to 12 and retain at 11.5)
_____ Option 7 (75 percent solids with no unstabilized solids)
_____ Option 8 (90 percent solids with unstabilized solids)
_____ None or unknown

g. Describe, on this form or another sheet of paper, any treatment processes used at the receiving facility to reduce vector attraction properties of sewage sludge

_____

_____

h. Describe, on this form or another sheet of paper, any other sewage sludge treatment activities performed by the other facility that are not identified in (d) - (g) above:

_____

_____

D.3. Vector Attraction Reduction

a. Which vector attraction option, if any, is met when sewage sludge is placed on this active sewage sludge unit?

_____ Option 9 (Injection below and surface)
_____ Option 10 (Incorporation into soil within 6 hours)
_____ Option 11 (Covering active sewage sludge unit daily)

D.3. Vector Attraction Reduction. (con't)

b. Describe, on this form or another sheet of paper, any treatment processes used at the active sewage sludge unit to reduce vector attraction properties of sewage sludge:

_____

_____

D.4. Ground-Water Monitoring.

a. Is ground-water monitoring currently conducted at this active sewage sludge unit, or are ground-water monitoring data otherwise available for this active sewage sludge unit?
_____ Yes _____ No

If yes, provide a copy of available ground-water monitoring data. Also, provide a written description of the well locations, the approximate depth to ground-water, and the ground-water monitoring procedures used to obtain these data.

_____

_____

b. Has a ground-water monitoring program been prepared for this active sewage sludge unit? _____ Yes _____ No

If yes, submit a copy of the ground-water monitoring program with this permit application.

c. Have you obtained a certification from a qualified ground-water scientist that the aquifer below the active sewage sludge unit has not been contaminated? _____ Yes _____ No

If yes, submit a copy of the certification with this permit application.

D.5. Site-Specific Limits. Are you seeking site-specific pollutant limits for the sewage sludge placed on the active sewage sludge unit?
_____ Yes _____ No

If yes, submit information to support the request for site-specific pollutant limits with this application.

M 03331 (CSO) and

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

E. INCINERATION

Complete this section if you fire sewage sludge in a sewage sludge incinerator.

Complete this section once for each incinerator in which you fire sewage sludge. If you fire sewage sludge in more than one sewage sludge incinerator, attach additional copies of this section as necessary.

E.1. **Incinerator Information.**

a. Incinerator name or number: _____

b. Incinerator location (Complete 1 and 2).

1. Street or Route # _____

County _____

City or Town _____ State _____ Zip _____

2. Latitude_____ Longitude_____

Method of latitude/longitude determination: _____ USGS map _____ Field survey _____ Other

E.2. **Amount Fired.** Dry metric tons per 365-day period of sewage sludge fired in the sewage sludge incinerator: _____ dry metric tons

E.3. **Beryllium NESHAP.**

a. Is the sewage sludge fired in this incinerator "beryllium-containing waste," as defined in 40 CFR Part 61.31? _____ Yes _____ No

Submit, with this application, information, test data, and description of measures taken that demonstrate whether the sewage sludge incinerated is beryllium-containing waste, and will continue to remain as such.

b. If the answer to (a) is yes, **submit with this application** a complete report of the latest beryllium emission rate testing and documentation of ongoing incinerator operating parameters indicating that the NESHAP emission rate limit for beryllium has been and will continue to be met.

E.4. **Mercury NESHAP.**

a. How is compliance with the mercury NESHAP being demonstrated?

_____ Stack testing (if checked, complete E.4.b)

_____ Sewage sludge sampling (if checked, complete E.4.c)

b. If stack testing is conducted, submit the following information with this application:

A complete report of stack testing and documentation of ongoing incinerator operating parameters indicating that the incinerator has met, and will continue to meet, the mercury NESHAP emission rate limit.

Copies of mercury emission rate tests for the two most recent years in which testing was conducted.

c. If sewage sludge sampling is used to demonstrate compliance, submit a complete report of sewage sludge sampling and documentation of ongoing incinerator operating parameters indicating that the incinerator has met, and will continue to meet the mercury NESHAP emission rate limit.

E.5. **Dispersion Factor.**

a. Dispersion factor, in micrograms/cubic meter per gram/second: _____

b. Name and type of dispersion model: _____

c. Submit a copy of the modeling results and supporting documentation with this application.

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

E.6. Control Efficiency.

a. Control efficiency, in hundredths, for the following pollutants:

Arsenic: _____ Chromium: _____ Nickel: _____

Cadmium: _____ Lead: _____

b. Submit a copy of the results or performance testing and supporting documentation (including testing dates) with this application.

E.7. Risk Specific Concentration for Chromium.

a. Risk specific concentration (RSC) used for chromium, in micrograms per cubic meter: _____

b. Which basis was used to determine the RSC?

____Table 2 in 40 CFR 503.43

____Equation 6 in 40 CFR 503,43 (site-specific determination)

c. If Table 2 was used, identify the type of incinerator used as the basis:

____Fluidized bed with wet scrubber

____Fluidized bed with wet scrubber and wet electrostatic precipitator

____Other types with wet scrubber

____Other types with wet scrubber and wet electrostatic precipitator

d. If Equation 6 was used, provide the following:

Decimal fraction of hexavalent chromium concentration to total chromium concentration in stack exit gas: _____

Submit results of incinerator stack tests for hexavalent and total chromium concentrations, including date(s) of test, with this application.

E.8. Incinerator Parameters

a. Do you monitor Total Hydrocarbons (THC) in the sewage sludge incinerator's exit gas? _____ Yes _____ No

Do you monitor Carbon Monoxide (CO) in the sewage sludge incinerator's exit gas? _____ Yes _____ No

b. Incinerator type: _____

c. Incinerator stack height, in meters: _____

Indicate whether value submitted is: _____ Actual stack height _____ Creditable stack height

E.9. Performance Test Operating Parameters

a. Maximum Performance Test Combustion Temperature: _____

b. Performance test sewage sludge feed rate, in dry metric tons/day: _____

indicate whether value submitted is:

_____ Average use _____ Maximum design

Submit, with this application, supporting documents describing how the feed rate was calculated.

c. Submit, with this application, information documenting the performance test operating parameters for the air pollution control device(s) used for this sewage sludge incinerator.

)103331 (CSO) and

FACILITY NAME AND PERMIT NUMBER: MA0101613
Springfield Regional Wastewater Treatment Facility

Form Approved 1/14/99
OMB Number 2040-0086

E.10. **Monitoring Equipment.** List the equipment in place to monitor the following parameters:

a. Total hydrocarbons or carbon monoxide: _____

b. Percent oxygen: _____

c. Moisture content: _____

d. Combustion temperature: _____

e. Other: _____

E.11. **Air Pollution Control Equipment.** Submit, with this application, a list of all air pollution control equipment used with this sewage sludge incinerator.

_____

_____

_____

_____

con-tes.
ANALYTICAL LABORATORY

Question: 25-B6h

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

REPORT DATE 11/10/2004

U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001
ATTN: JOHN COLBURN

CONTRACT NUMBER:
PURCHASE ORDER NUMBER:

PROJECT NUMBER:

ANALYTICAL SUMMARY

LIMS BAT #: LIMS-83340
JOB NUMBER: -

The results of analyses performed on the following samples submitted to the CON-TEST Analytical Laboratory are found in this report.

PROJECT LOCATION:

FIELD SAMPLE #	LAB ID	MATRIX	SAMPLE DESCRIPTION	TEST	
*2241	04B35463	SLUDGE	NOT SPECIFIED	tclp-metals-full	
*2241	04B35463	SLUDGE	NOT SPECIFIED	tclp-pestic-full	
*2241	04B35463	SLUDGE	NOT SPECIFIED	tclp-semivo-full	
*2241	04B35463	SLUDGE	NOT SPECIFIED	tclp-volati-full	
*2241	04B35464	SLUDGE	NOT SPECIFIED	tclp-herbic-full	SUBCONTRACTED
*2241	04B35465	SLUDGE	NOT SPECIFIED	8260 dry weight	
*2241	04B35465	SLUDGE	NOT SPECIFIED	8270 dry weight	
*2241	04B35465	SLUDGE	NOT SPECIFIED	solids (percent)	

The CON-TEST Environmental Laboratory operates under the following certifications and accreditations :

AIHA 100033	AIHA ELLAP (LEAD) -100033	
MASSACHUSETTS MA0100	NEW HAMPSHIRE NELAP 2516	NEW JERSEY NELAP NJ MA007 (AIR)
CONNECTICUT PH-0567	VERMONT DOH (LEAD) No. LL015036	ARIZONA AZ0648
NEW YORK ELAP/NELAP 10899	RHODE ISLAND (LIC. No. 112)	ARIZONA AZ0654 (AIR)

I certify that the analyses listed above, unless specifically listed as subcontracted, if any, were performed under my direction according to the approved methodologies listed in this document, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete.

Sondra S. Kocot 11/10/04

SIGNATURE DATE

Tod Kopyscinski
Director of Operations

Sondra S. Kocot
Quality Control Coordinator

Edward Denson
Technical Director

* See end of data tabulation for notes and comments pertaining to this sample

Springfield Regional Wastewater Treatment Facility
NPDES 0101613 and MA0103331 (CSO)
Outfall 041

14 pages

con-test
ANALYTICAL LABORATORY

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004
Page 1 of 13

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/F
Acetone	mg/kg dry wt	141.	11/02/04	MFF	0.412			
Acrolein	mg/kg dry wt	ND	11/02/04	MFF	0.165			
Acrylonitrile	mg/kg dry wt	ND	11/02/04	MFF	0.041			
tert-Amylmethyl Ether	mg/kg dry wt	ND	11/02/04	MFF	0.004			
Benzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
Bromobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Bromochloromethane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Bromodichloromethane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Bromoform	mg/kg dry wt	ND	11/02/04	MFF	0.010			
Bromomethane	mg/kg dry wt	ND	11/02/04	MFF	0.010			
2-Butanone (MEK)	mg/kg dry wt	114.	11/02/04	MFF	0.099			
tert-Butyl Alcohol	mg/kg dry wt	ND	11/02/04	MFF	0.165			
n-Butylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.006			
sec-Butylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
tert-Butylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.007			
tert-Butylethyl Ether	mg/kg dry wt	ND	11/02/04	MFF	0.004			
Carbon Disulfide	mg/kg dry wt	0.165	11/02/04	MFF	0.025			
Carbon Tetrachloride	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Chlorobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
Chlorodibromomethane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Chloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.007			
2-Chloroethylvinylether	mg/kg dry wt	ND	11/02/04	MFF	0.079			
Chloroform	mg/kg dry wt	0.017	11/02/04	MFF	0.016			
Chloromethane	mg/kg dry wt	ND	11/02/04	MFF	0.124			
2-Chlorotoluene	mg/kg dry wt	0.006	11/02/04	MFF	0.005			
4-Chlorotoluene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
1,2-Dibromo-3-Chloropropane	mg/kg dry wt	ND	11/02/04	MFF	0.013			
1,2-Dibromoethane	mg/kg dry wt	ND	11/02/04	MFF	0.006			
Dibromomethane	mg/kg dry wt	ND	11/02/04	MFF	0.009			
1,2-Dichlorobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.007			

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
1,3-Dichlorobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
1,4-Dichlorobenzene	mg/kg dry wt	0.014	11/02/04	MFF	0.007			
cis-1,4-Dichloro-2-Butene	mg/kg dry wt	ND	11/02/04	MFF	0.020			
trans-1,4-Dichloro-2-Butene	mg/kg dry wt	ND	11/02/04	MFF	0.017			
Dichlorodifluoromethane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
1,1-Dichloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.006			
1,2-Dichloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.007			
1,1-Dichloroethylene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
cis-1,2-Dichloroethylene	mg/kg dry wt	ND	11/02/04	MFF	0.008			
trans-1,2-Dichloroethylene	mg/kg dry wt	ND	11/02/04	MFF	0.007			
1,2-Dichloropropane	mg/kg dry wt	ND	11/02/04	MFF	0.005			
1,3-Dichloropropane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
2,2-Dichloropropane	mg/kg dry wt	ND	11/02/04	MFF	0.007			
1,1-Dichloropropene	mg/kg dry wt	ND	11/02/04	MFF	0.012			
cis-1,3-Dichloropropene	mg/kg dry wt	ND	11/02/04	MFF	0.008			
trans-1,3-Dichloropropene	mg/kg dry wt	ND	11/02/04	MFF	0.004			
Diethyl Ether	mg/kg dry wt	ND	11/02/04	MFF	0.016			
Diisopropyl Ether	mg/kg dry wt	ND	11/02/04	MFF	0.004			
1,4-Dioxane	mg/kg dry wt	ND	11/02/04	MFF	0.412			
Ethyl Benzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
Ethyl Methacrylate	mg/kg dry wt	ND	11/02/04	MFF	0.007			
Hexachlorobutadiene	mg/kg dry wt	ND	11/02/04	MFF	0.011			
2-Hexanone	mg/kg dry wt	0.446	11/02/04	MFF	0.080			
Iodomethane	mg/kg dry wt	ND	11/02/04	MFF	0.007			
Isopropylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.005			
p-Isopropyltoluene	mg/kg dry wt	0.015	11/02/04	MFF	0.006			
MTBE	mg/kg dry wt	ND	11/02/04	MFF	0.007			
Methylene Chloride	mg/kg dry wt	ND	11/02/04	MFF	0.124			
MIBK	mg/kg dry wt	ND	11/02/04	MFF	0.073			
Naphthalene	mg/kg dry wt	ND	11/02/04	MFF	0.008			

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004
Page 3 of 13

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/F
n-Propylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.007			
Styrene	mg/kg dry wt	ND	11/02/04	MFF	0.006			
1,1,1,2-Tetrachloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.008			
1,1,2,2-Tetrachloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.012			
Tetrachloroethylene	mg/kg dry wt	0.010	11/02/04	MFF	0.008			
Tetrahydrofuran	mg/kg dry wt	ND	11/02/04	MFF	0.041			
Toluene	mg/kg dry wt	10.5	11/02/04	MFF	0.006			
1,2,3-Trichlorobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.006			
1,2,4-Trichlorobenzene	mg/kg dry wt	ND	11/02/04	MFF	0.006			
1,1,1-Trichloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.007			
1,1,2-Trichloroethane	mg/kg dry wt	ND	11/02/04	MFF	0.006			
Trichloroethylene	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Trichlorofluoromethane	mg/kg dry wt	ND	11/02/04	MFF	0.006			
1,2,3-Trichloropropane	mg/kg dry wt	ND	11/02/04	MFF	0.011			
1,2,4-Trimethylbenzene	mg/kg dry wt	0.032	11/02/04	MFF	0.008			
1,3,5-Trimethylbenzene	mg/kg dry wt	ND	11/02/04	MFF	0.008			
Vinyl Acetate	mg/kg dry wt	ND	11/02/04	MFF	0.135			
Vinyl Chloride	mg/kg dry wt	ND	11/02/04	MFF	0.008			
m + p Xylene	mg/kg dry wt	ND	11/02/04	MFF	0.011			
o-Xylene	mg/kg dry wt	ND	11/02/04	MFF	0.008			

Analytical Method:
SW846 8260
SAMPLES ARE CONCENTRATED BY PURGE & TRAP, FOLLOWED BY GC/MS TARGET COMPOUND ANALYSIS.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
Acenaphthene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Acenaphthylene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Acetophenone	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Aniline	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Anthracene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzidine	mg/kg dry wt	ND	11/02/04	BGL	11.7			
Benzoic Acid	mg/kg dry wt	ND	11/02/04	BGL	5.03			
Benzo(a)anthracene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzo(a)pyrene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzo(b)fluoranthene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzo(g,h,i)perylene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzo(k)fluoranthene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Benzyl Alcohol	mg/kg dry wt	ND	11/02/04	BGL	3.35			
1,1-Biphenyl	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Bis(2-chloroethoxy)methane	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Bis(2-chloroethyl)ether	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Bis(2-chloroisopropyl)ether	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Bis(2-ethylhexyl)phthalate	mg/kg dry wt	8.50	11/02/04	BGL	1.68			
4-Bromophenyl phenyl ether	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Butylbenzylphthalate	mg/kg dry wt	ND	11/02/04	BGL	3.35			
4-Chloroaniline	mg/kg dry wt	ND	11/02/04	BGL	3.35			
4-Chloro-3-methylphenol	mg/kg dry wt	ND	11/02/04	BGL	3.35			
2-Chloronaphthalene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2-Chlorophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
4-Chlorophenylphenyl ether	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Chrysene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Dibenzofuran	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Dibenz(a,h)anthracene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
1,2-Dichlorobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
1,3-Dichlorobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/F
1,4-Dichlorobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
3,3'-Dichlorobenzidine	mg/kg dry wt	ND	11/02/04	BGL	0.84			
2,4-Dichlorophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Diethylphthalate	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2,4-Dimethylphenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Dimethylphthalate	mg/kg dry wt	ND	11/02/04	BGL	3.35			
Di-n-butylphthalate	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Di-n-octylphthalate	mg/kg dry wt	ND	11/02/04	BGL	3.35			
1,2-Dinitrobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
1,3-Dinitrobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
1,4-Dinitrobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
4,6-Dinitro-2-methylphenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2,4-Dinitrophenol	mg/kg dry wt	ND	11/02/04	BGL	3.35			
2,4-Dinitrotoluene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2,6-Dinitrotoluene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
1,2-Diphenylhydrazine (as Azobenzene)	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Fluoranthene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Fluorene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Hexachlorobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Hexachlorobutadiene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Hexachlorocyclopentadiene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Hexachloroethane	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Indeno(1,2,3-cd)pyrene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Isophorone	mg/kg dry wt	ND	11/02/04	BGL	1.68			
o-cresol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
m & p-cresol(s)	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2-Methylnaphthalene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Naphthalene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
2-Nitroaniline	mg/kg dry wt	ND	11/02/04	BGL	1.68			

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004
Page 6 of 13

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : 04B35465

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
3-Nitroaniline	mg/kg dry wt	ND	11/02/04	BGL	1.68			
4-Nitroaniline	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Nitrobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2-Nitrophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
4-Nitrophenol	mg/kg dry wt	ND	11/02/04	BGL	3.35			
N-Nitrosodimethylamine	mg/kg dry wt	ND	11/02/04	BGL	1.68			
N-Nitrosodiphenylamine	mg/kg dry wt	ND	11/02/04	BGL	1.68			
N-Nitroso-di-n-propylamine	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Pentachlorophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Phenanthrene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Phenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
Pyrene	mg/kg dry wt	ND	11/02/04	BGL	0.84			
Pyridine	mg/kg dry wt	ND	11/02/04	BGL	1.68			
1,2,4-Trichlorobenzene	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2,4,5-Trichlorophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			
2,4,6-Trichlorophenol	mg/kg dry wt	ND	11/02/04	BGL	1.68			

Analytical Method:
SW846 8270
SAMPLES ARE EXTRACTED IN METHYLENE CHLORIDE/ACETONE AND FOLLOWED BY GC/MS TARGET COMPOUND ANALYSIS.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241
Sample ID : 04B35465
Sample Matrix: SLUDGE

LIMS-BAT #: LIMS-83340
Job Number: -

Sampled : 10/20/2004
NOT SPECIFIED

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
Solids, total	%	19.9	10/28/04	LL				

Analytical Method:
SM 2540G
PERCENT OF SAMPLE REMAINING AFTER DRYING OVERNIGHT AT 103-105 DEGREES CENTIGRADE.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241
Sample ID : 04B35464

LIMS-BAT #: LIMS-83340
Job Number: -

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units		Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/F
2,4-D	MG/L	TCLP	ND	11/04/04	PEL	0.005		10	P
2,4,5-TP	MG/L	TCLP	ND	11/04/04	PEL	0.001		1	P

Analytical Method:
SW846 1311/8150
SAMPLES ARE EXTRACTED FOR 18-24 HOURS AT pH 5.0, FOLLWED BY LIQUID/LIQUID EXTRACTION AND DERIVATIZATION. ANALYSIS IS BY GAS CHROMATOGRAPHY WITH ELECTRON CAPTURE DETECTION.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured
* = See end of report for comments and notes applying to this sample

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

LIMS-BAT #: LIMS-83340
Job Number: -

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241
Sample ID : 04B35463

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
Arsenic	mg/l leachate	ND	11/02/04	KRL	0.10		5	P
Barium	mg/l leachate	0.31	11/02/04	KRL	0.05		100	P
Cadmium	mg/l leachate	ND	11/02/04	KRL	0.005		1	P
Chromium	mg/l leachate	ND	11/02/04	KRL	0.05		5	P
Lead	mg/l leachate	ND	11/02/04	KRL	0.02		5	P
Mercury	mg/l leachate	ND	11/01/04	JTB	0.00004		0.2	P
Selenium	mg/l leachate	ND	11/02/04	KRL	0.10		1	P
Silver	mg/l leachate	ND	11/02/04	KRL	0.05		5	P

Analytical Method:
SW846 1311/6010 1311/7470

SW846 1311 TCLP EXTRACTION. SAMPLES ARE EXTRACTED FOR 18-24 HOURS INTO A pH 5.0 BUFFER SOLUTION TO PRODUCE A LEACHATE. WATER SAMPLES ARE FILTERED, NOT EXTRACTED.

SW846 6010 ARSENIC, BARIUM, CADMIUM, CHROMIUM, LEAD, SELENIUM AND SILVER LEACHATES ARE ANALYZED BY INDUCTIVELY COUPLED PLASMA EMISSION SPECTROMETRY.

SW846 7470 MERCURY LEACHATE IS ANALYZED BY COLD VAPOR (FLAMELESS) ATOMIC ABSORPTION SPECTROPHOTOMETRY.

RL = Reporting Limit

ND = Not Detected

NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241
Sample ID : *04B35463

LIMS-BAT #: LIMS-83340
Job Number: -

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
gamma-BHC (Lindane)	MG/L TCLP	ND	11/05/04	JB	0.001		0.4	P
Total Chlordane	MG/L TCLP	ND	11/05/04	JB	0.004		0.03	P
Endrin	MG/L TCLP	ND	11/05/04	JB	0.001		0.02	P
Heptachlor	MG/L TCLP	ND	11/05/04	JB	0.001		0.008	P
Heptachlor Epoxide	MG/L TCLP	ND	11/05/04	JB	0.001		0.008	P
Methoxychlor	MG/L TCLP	ND	11/05/04	JB	0.010		10	P
Toxaphene	MG/L TCLP	ND	11/05/04	JB	0.020		0.5	P

Analytical Method:
SW846 1311/3510/8081
SAMPLES ARE EXTRACTED ACCORDING TO TCLP, FOLLOWED BY LIQUID/LIQUID EXTRACTION INTO METHYLENE CHLORIDE/HEXANE, EVAPORATION AND ANALYSIS BY GAS CHROMATOGRAPHY WITH ELECTRON CAPTURE DETECTION.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured
* = See end of report for comments and notes applying to this sample

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

con-test®
ANALYTICAL LABORATORY
39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : **2241**
Sample ID : ***04B35463**

LIMS-BAT #: LIMS-83340
Job Number: -

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/ F
2,4-Dinitrotoluene	MG/L TCLP	ND	11/04/04	BGL	0.05		0.13	P
Hexachlorobenzene	MG/L TCLP	ND	11/04/04	BGL	0.05		0.13	P
Hexachlorobutadiene	MG/L TCLP	ND	11/04/04	BGL	0.05		0.5	P
Hexachloroethane	MG/L TCLP	ND	11/04/04	BGL	0.05		3	P
o-cresol	MG/L TCLP	ND	11/04/04	BGL	0.05		200	P
m & p-cresol(s)	MG/L TCLP	0.86	11/04/04	BGL	0.05		200	P
Nitrobenzene	MG/L TCLP	ND	11/04/04	BGL	0.05		2	P
Pentachlorophenol	MG/L TCLP	ND	11/04/04	BGL	0.05		100	P
Pyridine	MG/L TCLP	ND	11/04/04	BGL	0.05		5	P
2,4,5-Trichlorophenol	MG/L TCLP	ND	11/04/04	BGL	0.05		400	P
2,4,6-Trichlorophenol	MG/L TCLP	ND	11/04/04	BGL	0.05		2	P

Analytical Method:
SW846 1311/8270

SAMPLES ARE EXTRACTED INTO pH 5.O BUFFER FOR 18-22 HOURS. THIS EXTRACT IS THEN EXTRACTED WITH METHYLENE CHLORIDE, FOLLOWED BY KUDERNA-DANISH EVAPORATIVE CONCENTRATION AND QUANTITATION BY GC/MS WITH TARGET COMPOUND ANALYSIS.

RL = Reporting Limit

ND = Not Detected

NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

con-test
ANALYTICAL LABORATORY

39 Spruce Street ° 2nd Floor ° East Longmeadow, MA 01028 ° FAX 413/525-6405 ° TEL. 413/525-2332

JOHN COLBURN
U. S. WATER - SPRINGFIELD
190 M. STREET
AGAWAM, MA 01001

11/10/2004

Purchase Order No.:

Project Location:
Date Received: 10/22/2004
Field Sample # : 2241

LIMS-BAT #: LIMS-83340
Job Number: -

Sample ID : *04B35463

Sampled : 10/20/2004
NOT SPECIFIED

Sample Matrix: SLUDGE

	Units	Results	Date Analyzed	Analyst	RL	SPEC Limit Lo	SPEC Limit Hi	P/F
Benzene	MG/L TCLP	ND	11/01/04	BGL	0.006		0.5	P
2-Butanone (MEK)	MG/L TCLP	1.91	11/01/04	BGL	0.120		200	P
Carbon Tetrachloride	MG/L TCLP	ND	11/01/04	BGL	0.005		0.5	P
Chlorobenzene	MG/L TCLP	ND	11/01/04	BGL	0.006		100	P
Chloroform	MG/L TCLP	ND	11/01/04	BGL	0.008		6	P
1,4-Dichlorobenzene	MG/L TCLP	ND	11/01/04	BGL	0.008		7.5	P
1,2-Dichloroethane	MG/L TCLP	ND	11/01/04	BGL	0.009		0.5	P
1,1-Dichloroethylene	MG/L TCLP	ND	11/01/04	BGL	0.006		0.7	P
Tetrachloroethylene	MG/L TCLP	ND	11/01/04	BGL	0.004		0.7	P
Trichloroethylene	MG/L TCLP	ND	11/01/04	BGL	0.010		0.5	P
Vinyl Chloride	MG/L TCLP	ND	11/01/04	BGL	0.003		0.2	P

Analytical Method:
SW846 1311/8260

SAMPLES ARE EXTRACTED WITH ZERO HEADSPACE (ZHE) INTO A pH 5.0 BUFFER SOLUTION FOR 18-22 HOURS. VOLATILE COMPONENTS ARE THEN QUANTITATED BY GC/MS WITH PURGE AND TRAP CONCENTRATION AND TARGET COMPOUND ANALYSIS.

RL = Reporting Limit
ND = Not Detected
NM = Not Measured

SPEC LIMIT = a client specified recommended or regulatory level for comparison with data to determine PASS (P) or FAIL (F) condition of results.

* = See end of report for comments and notes applying to this sample

United Water Spfld. Inv# 83340

CHAIN OF CUSTODY RECORD

[redacted]

Sampled by (print): OPS / John Colburn
Sampled by (signature): John Colburn
Sample Type: 2241 – Press Cake

Describe sample location:

Laboratory I.D.#	Sample Collection Period Start Date/Time	Stop Date/Time	GRAB	COMP	pH*	Analysis Requested	Preservative
2241	10/19/04 2600	10/20/04 0600				Full TCLP	Refrig.
24B35463-64-65						VOC + Semi VOC	

Relinquished By	Date	Time	Received By
John Colburn print: John Colburn	10/22/04	1:05 PM	print: Lisa Veratti Dagnoli
print:			print:
print:			print: (nis)
print:			print: Full TCLP plus VOC + Semi's

Comments: * sludge, press cake is Matrix
sample has TCLP ~~+ etc~~ VOC + Semi VOC (nis)

* pH on site prior to preservation
Budget Account Number:

B.7. Land Application of Bulk Sewage Sludge. (con't)

b. Do you identify all land application sites in Section C of this application? _____ Yes _____ No

If no, submit a copy of the land application plan with application (see instructions).

c. Are any land application sites located in States other than the State where you generate sewage sludge or derive a material from sewage sludge? _____ Yes _____ No

If yes, describe, on this form or another sheet of paper, how you notify the permitting authority for the States where the land application sites are located. Provide a copy of the notification.

_____

_____

Complete Section B.8 if sewage sludge from your facility is placed on a surface disposal site.

B.8. Surface Disposal.

a. Total dry metric tons of sewage sludge from your facility placed on all surface disposal sites per 365-day period: _____ dry metric tons

b. Do you own or operate all surface disposal sites to which you send sewage sludge for disposal?

_____ Yes _____ No

If no, answer B.8.c through B.8.f for each surface disposal site that you do not own or operate. If you send sewage sludge to more than one such surface disposal site, attach additional pages as necessary.

c. Site name or number _____

d. Contact person _____

Title _____

Telephone number _____

Contact is _____ Site owner _____ Site operator

e. Mailing address _____

_____

f. Total dry metric tons of sewage sludge from your facility placed on this surface disposal site per 365-day period: _____ dry metric tons

Complete Section B.9 if sewage sludge from your facility is fired in a sewage sludge incinerator.

B.9. Incineration.

a. Total dry metric tons of sewage sludge from your facility fired in all sewage sludge incinerators per 365-day period: 979 dry metric tons

b. Do you own or operate all sewage sludge incinerators in which sewage sludge from your facility is fired? _____ Yes X No

If no, complete B.9.c through B.9.f for each sewage sludge incinerator that you do not own or operate. If you send sewage sludge to more than one such sewage sludge incinerator, attach additional pages as necessary.

c. Incinerator name or number: Veolia Water - Nagatuck

d. Contact person: Doug Ritchie

Title: Facility Manager

Telephone number: 202-723-1433

Contact is: _____ Incinerator owner X Incinerator operator

B.9. Incineration. (con't)

e. Mailing address: 500 Cherry Street
Nagatuck, CT 06770

f. Total dry metric tons of sewage sludge from your facility fired in this sewage sludge incinerator per 365-day period: _____ dry metric tons

Complete Section B.10 if sewage sludge from this facility is placed on a municipal solid waste landfill.

B.10. Disposal in a Municipal Solid Waste Landfill. Provide the following information for each municipal solid waste landfill on which sewage sludge from your facility is placed. If sewage sludge is placed on more than one municipal solid waste landfill, attach additional pages as necessary. See Attached.

a. Name of landfill (1) Chicopee Sanitary Landfill
(2) RCI Fitchburg/Westminster Landfill

b. Contact person (3) Waste Management of New Hampshire - TLR Refuse Disposal Facility

Title (4) Seneca Meadows, Inc.

Telephone number

Contact is _____ Landfill owner _____ Landfill operator

c. Mailing address _____

_____

d. Location of municipal solid waste landfill:

Street or Route # _____

County _____

City or Town _____ State _____ Zip _____

e. Total dry metric tons of sewage sludge from your facility placed in this municipal solid waste landfill per 365-day period:

_____ dry metric tons

f. List, on this form or an attachment, the numbers of all other Federal, State, and local permits that regulate the operation of this municipal solid waste landfill.

Permit Number	Type of Permit

g. Submit, with this application, information to determine whether the sewage sludge meets applicable requirements for disposal of sewage sludge in a municipal solid waste landfill (e.g., results of paint filter liquids test and TCLP test)

h. Does the municipal solid waste landfill comply with applicable criteria set forth in 40 CFR Part 258?

_____ Yes _____ No

Additional Information

Name of Landfill	Chicopee Sanitary Landfill
Contact Person	Jonathan Murray
Title	Sr. District Manager
Telephone	413-534-8741, ext 222
Contact is Owner or Operator	CT Valley: Owner/Operator
Mailing Address	600 New Ludlow Road South Hadley, MA 01075
Location of Waste Disposal	Chicopee Sanitary Landfill
Street or Route #	161 New Lombard Road
County	Hampden
City of Town	Chicopee
State	MA
Zip Code	01020
Do you meet the requirements of 40 CFR Part 258?	Yes
Permit Number	WO45517
Permit Type	Solid Waste ATO
Method for Determining Compliance	Analytical Data and SPW Permit Requirements
Total Dry Metric Tons Delivered 2004	2,705.60

Springfield Regional Wastewater Treatment Facility
NPDES 0101613 and MA0103331 (CSO)
Outfall 041

QuestionB.10.A

58 Pages

MUNICIPAL LANDFILL RECEIVING SLUDGE FROM SPRINGFIELD REGIONAL WASTEWATER TREATMENT FACILITY

Name of Landfill	Seneca Meadows, Inc.
Contact Person	Don Genticore
Title	General Manager
Telephone	315-539-5624
Contact is Owner or Operator	Operator
Mailing Address	1786 Salcman Road
Location of Waste Disposal	Waterloo, NY 13165
Street or Route No.	1786 Salcman Road
County	Seneca
City or Town	Waterloo
State	New York
Zip Code	13165
Do you meet the requirements of 40 CFR Part 258	Yes
Permit Number	DEC 8-4532-00023/00001-0
Permit Type	Operation of Mixed Solid Waste Landfill
Method for Determining Compliance	
Total Metric Tons Delivered 2004 **Total Metric Tons Delivered through June 30, 2005**	0 433.36 tons

NPDES 0101613
Outfall 041
Question B.10 A

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE

JANE SWIFT
Governor

BOB DURAND
Secretary

LAUREN A. LISS
Commissioner

NOV 15 2002

Waste Management, Inc.
600 New Ludlow Road
South Hadley, MA 01075
Attention: Robert Magnusson, Regional Engineer

Re: Chicopee Landfill
Special Waste Determination
Resource Control Composting, Inc.
Sludge Compost
BWPSW14
Transmittal # W032495
File No. 02-061-002

Dear Mr. Magnusson:

The Department of Environmental Protection (the "Department") has reviewed a Special Waste Determination permit application to dispose of composted wastewater treatment plant sludge material at the Chicopee Landfill located off New Lombard Road in Chicopee, Massachusetts. The application was submitted on behalf of the landfill operator, Connecticut Valley Sanitary Waste Disposal, Inc. (CVSWD) by Waste Management, Inc. (WMI), the parent company of CVSWD. It is the Department's understanding that disposal of the material at the landfill under a temporary Special Waste permit is acceptable to the City of Chicopee.

The material consists of wastewater treatment plant (WWTP) sludge from the City of Springfield's Bondi Island WWTP, which is composted at the Resource Control Composting, Inc. (RCCI) composting facility, located adjacent to the WWTP. The sludge is mixed with woodchips and placed in an aerated composting vessel for a minimum of 21 days. Approximately 300 tons per week of composted sludge is produced each week at the RCCI facility. The sludge compost is sampled on a monthly basis for total metals, pH, ammonia, and other various parameters.

The average levels over the last seven months (April through October) of the sludge compost analytical results for the metals on the USEPA Toxicity Characteristic Leaching Procedure (TCLP) list, pH (corrosivity), and % solids were calculated, and are as follows:

- The average arsenic level was 3.5 milligrams/kilogram (mg/kg);

period of one year following the date of this permit. If continued disposal is desired after that time, CVSWD must submit a written request to the Department to extend the permit approval period. The written request must outline the specific reasons why beneficial reuse of the sludge compost is not feasible versus disposal as a Special waste at the landfill.

6. The disposal of the sludge compost shall not create nuisance conditions, particularly nuisance dusts or odors. If nuisance odors are produced, additional odor-control methods (i.e., lime stabilization, etc.) shall be employed, or disposal of the sludge compost at the landfill shall be discontinued.

7. This permit is subject to review by the City of Chicopee (the City). CVSWD shall gain approval from the City prior to acceptance of the sludge compost as a Special Waste at the landfill.

8. The Department reserves the right to modify or rescind this approval at any time, should the conditions of this approval not be met, should nuisance conditions (particularly nuisance odors) be created, or should the Department otherwise determine that the disposal of the sludge compost at the landfill poses a threat to public health, safety or the environment.

Pursuant to 310 CMR 19.037(5), any person aggrieved by the issuance of this approval, except as provided by 310 CMR 19.037(4)(b), may file an appeal for judicial review of said decision in accordance with the provisions of M.G.L. c. 111, s. 150A and C. 30A not later than thirty [30] days following notice of this decision. Any aggrieved person intending to appeal the decision to the superior court shall provide notice to the Department of said intention to commence such action. Said Notice of Intention shall include the Department File Number (00-061-002) and shall identify with particularity the issues and reason(s) why it is believed the approval decision was not proper. Such notice shall be provided to the Office of General Counsel of the Department and the Regional Director for the regional office which made the decision.

The appropriate addresses to which to send such notices are:

General Counsel
Department of Environmental Protection
One Winter Street-Third floor
Boston, 02108

Michael J. Gorski
Regional Director
Department of Environmental Protection
436 Dwight Street - 4th Floor
Springfield, MA 01103

No allegation shall be made in any judicial appeal of this decision unless the matter complained of was raised at the appropriate point in the administrative review procedures established in those regulations, provided that matter may be raised upon a showing that it is material and that it was not reasonably possible with due diligence to have been raised during such procedures or that matter

sought to be raised is of critical importance to the public health or environmental impact of the permitted activity.

This Determination pertains only to the solid waste management aspect of the proposal and does not negate the responsibility of the owners or operators to comply with any other applicable state, local, or federal laws or regulations now or in the future.

If you have any questions concerning this matter, please contact Larry Hanson of this office, at #413-755-2287.

Sincerely,

Daniel Hall
Section Chief, Solid Waste Management
Western Region

Cc: Chicopee Board of Health
Chicopee Dept. of Public Works – Stanley Kulig, Superintendent

- The average cadmium level was 2.5 mg/kg;
- The average chromium level was 57 mg/kg;
- The average lead level was 46 mg/kg;
- The average mercury level was 0.55 mg/kg;
- The average selenium level was 0.6 mg/kg;
- All of these average levels are less than the theoretical limits where TCLP tests would be required (20 times the TCLP limits);
- The average pH level was 7.64; and
- The average % solids was 42%.

The application states that the composted sludge will be transported to the landfill in trailer trucks. The composted sludge will not be stored or processed at the landfill. The composted sludge will be dumped at the working face of the landfill, spread into a lift one to two feet thick, and covered immediately with other municipal solid waste (MSW).

Department Determinations

The Department has reviewed the proposed Special Waste Determination permit application to dispose of the composted WWTP sludge material at the Chicopee Landfill in accordance with the Massachusetts Solid Waste Regulations 310 CMR 16.00 & 19.000. The Department approves the Special Waste permit, subject to the following conditions and requirements.

1. This approval is only for the subject composted WWTP sludge from the RCCI sludge compost facility (Bondi Island, Route 5, Agawam, MA) at the Chicopee Landfill, located off New Lombard Road in Chicopee, MA.

2. Based on the analytical data submitted, the sludge compost is not a characteristic hazardous waste, and can be accepted for disposal as a Special Waste at the landfill.

3. As proposed, upon arrival at the landfill, the sludge compost must immediately be buried with MSW and/or cover material at the working face.

4. As outlined in 310 CMR 19.061(d), the subject sludge compost accepted for disposal at the landfill shall comply with the following:
   A. The sludge compost shall not contain free draining liquids;
   B. The sludge compost shall contain a minimum of 20% solids; and
   C. Odor-control methods shall be employed if the sludge compost is odor-producing.

5. The maximum amount of the sludge compost which may be accepted for disposal at the landfill in any calendar year shall not exceed 7,500 tons. This approval is only valid for a

Additional Information

Name of Landfill	RCI Fitchburg/Westminster Landfill
Contact Person	Thomas Murray
Title	District Manager
Telephone	508-208-7872
Contact is Owner or Operator	District Manager Operator
Mailing Address	P.O. Box 406 Westminster, MA 01473
Location of Waste Disposal	Fitchburg/Westminster Sanitary Landfill
Street or Route #	Route 31; 101 Fitchburg Road
County	Worcester
City of Town	Westminster
State	MA
Zip Code	01473
Do you meet the requirements of 40 CFR Part 258?	Yes
Permit Number	W 050780
Permit Type	Solid Waste ATO
Method for Determining Compliance	Percent solids analytical data
Total Dry Metric Tons Delivered 2004	2,471.33

Springfield Regional Wastewater Treatment Facility
NPDES 0101613 and MA0103331 (CSO)
Outfall 041
Questio B.10.A

F/W
21.1

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE
Commissioner

Mr. Robert Magnusson
Resource Control, Inc.
124 Hartwell Street
West Boylston, MA 01538

February 26, 2004

RE: SPECIAL WASTE DETERMINATION
Application for: BWP SW 14, Major Special Waste Determination for the Fitchburg/Westminster Sanitary Landfill, Westminster.

Transmittal Number: W041513

Dear Mr. Magnusson:

The Department of Environmental Protection (the "Department") has received the Special Waste Determination Permit Application (the "Application") submitted by Resource Control Inc., on November 28, 2003, for the Fitchburg/Westminster Landfill Facility located on Route 31 in Westminster, Massachusetts. The Department completed its technical review of the Application listed above and has determined that the Application is technically complete. Accordingly, the Department hereby issues the attached Provisional Permit.

The Provisional Permit is issued pursuant to Massachusetts General Laws (M.G.L.) Chapter 111, Section 150A and 310 CMR 19.061: Special Waste, of the "Solid Waste Management Facility Regulations". Pursuant to the provisions of 310 CMR 19.061(5)(f), the DEP will accept written comments on this Permit from the local Board of Health, for fourteen (14) days from the date of notification. Unless rescinded or modified by the Department prior to the effective date, this Permit shall become effective twenty-one (21) days from the date of issuance of this Permit.

If you have any questions or comments regarding this matter, please write to me at the letterhead address or contact Mr. Mike Penny of this Office at (508) 792-7650 Ext. 2835.

Very truly yours,

2/26/04
Date

John J. Regan
Section Chief
Solid Waste Management Program

Encl: Provisional Special Waste Permit

cc: Paul Emond, BWP, DEP-Boston
Fitchburg Board of Health
Westminster Board of Health
William C. Goodman, Brown and Caldwell

MTP\JJR
W:\Swm\Final2003\Permits2003\Fitch-Westmin LF Sw14 Tc

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE
Commissioner

PROVISIONAL PERMIT
SPECIAL WASTE DETERMINATION – MAJOR (BWP SW 14)
Wastewater Sludge & Compost for Disposal at the Fitchburg/Westminster Landfill

Provisional Permit Date: February 26, 2004
Final Permit Date:

Applicant Name:	Resource Control Inc.
Mailing Address:	124 Hartwell Street West Boylston, MA 01583
Name of Facility:	Fitchburg/Westminster Sanitary Landfill
Facility Address:	Fitchburg Road (Route 31) Westminster, MA 01473
DEP Region:	Department of Environmental Protection ("Department" or "DEP") Central Regional Office (CERO), Worcester
Transmittal #:	W041513

I. PERMIT APPLICATION INFORMATION

A. Reviews and Approvals Affecting Proposed Special Waste Determination

1. Title/Description(s) of Approvals/Permits to be modified by this Permit:
Not Applicable

B. Application Information for BWP SW 14 Special Waste Determination

1. Applicant Name: Resource Control Inc.

2. Transmittal Number: W041513

3. Start Date of Application: December 3, 2003

4. Date of Fee Receipt: December 3, 2003

5. Application Prepared by:

Brown and Caldwell
48 Leona Drive, Suite C
Middleborough, MA 02346
Contacts: William C. Goodman (508) 923-0879

6. Title of Submittal(s) and Date of Receipt at DEP, CERO:

Application for Special Waste Determination - Major
Wastewater Sludge & Sludge Compost
Fitchburg/Westminster Sanitary Landfill
Dated: November 2003
Received by DEP-CERO: November 28, 2003

II. SPECIAL WASTE DETERMINATION APPLICATION REVIEW AND APPROVAL

Application Number W041513 "The Application" complies with the requirements of 310 CMR 19.000, the **Solid Waste Management Facility Regulations** and was reviewed in accordance with the provisions of Section 19.061: Special Waste.

Resource Control Inc. (RCI), a subsidiary of Waste Management, is seeking approval under the requirements of 310 CMR 19.061, for the disposal of wastewater sludge and wastewater sludge compost at the Fitchburg/Westminster Sanitary Landfill in Westminster, Massachusetts. RCI is proposing to accept at the Fitchburg/Westminster facility wastewater sludge generated from the Bondi's Island Wastewater Treatment Plant and a wastewater sludge compost product from Resource Control Composting, Inc. both located in Agawam, Massachusetts.

Currently, the Fitchburg/Westminster Landfill accepts sludge from the Town of Hudson Wastewater Treatment Plant. The estimated total quantity of sludge/compost material to be landfilled at the Fitchburg/Westminster Landfill is 58,000 tons per year, or 185 tons per day. RCI proposes that the sludge compost tonnage be limited not to exceed more than 20 percent of the waste tonnage for any given day.

This document is a permit issued pursuant to Massachusetts General Laws (M.G.L.), Chapter 111, Section 150A and 310 CMR 19.000, and is subject to the conditions set forth below.

III. GENERAL PERMIT CONDITIONS

1. The use of this material shall not adversely affect the public health, safety or the environment.

2. The handling and disposal of this material shall be performed in compliance with other applicable local, state and federal laws and regulations.

3. The Department reserves the right to rescind, suspend or modify this permit by the imposition of additional conditions based upon a determination of actual, or the threat of, adverse impacts from the handling and/or disposal of this material.

4. RCI shall provide the Department, within a reasonable time, any information which the Department may request and which is deemed by the Department to be relevant in determining whether a cause exists to modify, revoke, or suspend a permit, or to determine whether RCI is complying with the terms and conditions of the permit.

IV. SPECIFIC PERMIT CONDITIONS

1. The handling and disposal of the wastewater sludge and wastewater sludge compost shall be in compliance with the requirements of 310 CMR 19.061(6) Management Requirements for Special Wastes.

2. The Operator shall instruct and train employees in proper handling and disposal procedures for the Special Waste approved to be managed by this Facility.

3. The Operator shall track specific tonnages from each source and provide a quarterly summary to the Department. Also included in the summary, shall be information that verifies that the sludge has been properly dewatered and meets the 20% solids disposal requirement.

4. Should nuisance odors or fugitive dust emissions develop as a result of the Beneficial Use activities described herein, appropriate measures to control odors and dust shall be instituted as soon as possible, but not later than forty-eight (48) hours, should conditions of excess odor and dust occur as a result of the Beneficial Use activities.

Typo - DEP did not properly edit

V. RIGHT OF APPEAL

A. Right to Appeal - Pursuant to 310 CMR 19.037(5), any person aggrieved by the issuance of this Permit may file an appeal for judicial review of said decision in accordance with the provisions of MGL, Chapter 111, Section 150A, and Chapter 30A not later than thirty [30] days following notice of this decision.

B. Notice of Appeal - Any aggrieved person intending to appeal the decision to the superior court shall provide notice to the Department of intention to commence such action. Said notice of intention shall include the Department File Number or Permit Number and shall identify with particularity the issues and reason(s) why it is believed the approval decision was not proper. Such notice shall be provided to the Office of General Counsel of the Department and the Regional Director for the regional office that made the decision. The appropriate addresses to send such notices are:

Office of General Counsel
Department of Environmental Protection
One Winter Street-Third floor
Boston, MA 02108

Regional Director
Department of Environmental Protection
Central Regional Office
627 Main Street
Worcester, MA 01608

No allegation shall be made in any judicial appeal of this decision, unless the matter complained of was raised at the appropriate point in the administrative review procedures established in those regulations, provided that matter may be raised upon a showing that it is material and that it was not reasonably possible with due diligence to have been raised during such procedures, or that the matter sought to be raised is of critical importance to the public health or environmental impact of the permitted activity.

Thank you, and if you have any questions or comments regarding this matter, please feel free to contact me or Mr. Mike Penny of this Office at (508) 792-7650 Ext. 2835.

John J. Regan
Section Chief
Solid Waste Management Program

MTP/JR

W:\Swm\Final2003\Permits\Fitch-Westmin LF SW 14 Tc

Cc: Paul Emond, BWP, DEP-Boston
Fitchburg Board of Health
Westminster Board of Health
William Goodman, Brown and Caldwell

Additional Information

Name of Landfill	Waste Management of New Hampshire- TLR-III Refuse Disposal Facility
Contact Person	Alan Davis
Title	District Manager
Telephone	603-330-2165
Contact is Owner or Operator	Operator
Mailing Address	PO Box 7065 Gonic, NH 03839
Location of Waste Disposal	TLR-III Refuse Disposal Facility
Street or Route #	90 Rochester Neck Road
County	Strafford County
City of Town	Gonic
State	NH
Zip Code	03839
Do you meet the requirements of 40 CFR Part 258?	Yes
Permit Number	DES-SW-SP-95-001
Permit Type	Solid Waste
Method for Determining Compliance	Profiles and Analytical Data Review
Total Dry Metric Tons Delivered 2004	1,382.13

Springfield Regional Wastewater Treatment Facility
NPDES 0101613 and MA0103331 (CSO)
Outfall 041

Question B.10.a

GENERAL INFORMATION

Waste Management of New Hampshire, Inc.
Turnkey Recycling & Environmental Enterprises (T.R.E.E.)
Non-Hazardous Solid Waste
Audit Form

Facility Name:	Waste Management of New Hampshire, Inc.- TLR-III Refuse Disposal Facility
Physical Location:	90 Rochester Neck Road Rochester, NH
Mailing Address:	30 Rochester Neck Road P.O. Box 7065 Gonic, NH 03839
Corporate Address:	Waste Management, Inc. 1001 Fannin Street, Suite 4000 Houston, TX 77002 713/512-6200
EPA ID#:	NHD980914634 (as generator)
NHDES Permit #:	DES-SW-SP-95-001
General Phone #:	603/330-2197

Names and Titles of Key Personnel:
Direct dial phone # is 603/330-(+4-digit extension)

Alan Davis	District Manager	extension 2166
Bill Howard	District Engineer	extension 2105
Ellen Bellio	Technical Manager	extension 2170
Victor Rivera	Approvals Coordinator	extension 2165

Waste Management of New Hampshire, Inc.
Turnkey Recycling & Environmental Enterprise (TREE)
Customer Audit Information

GENERAL INFORMATION

FACILITY NAME: Waste Management of New Hampshire, Inc.
TLR-III Refuse Disposal Facility (TLR-III RDF)

PHYSICAL LOCATION: 90 Rochester Neck Road
Rochester, NH

MAILING ADDRESS: 30 Rochester Neck Road
P.O. Box 7065
Gonic, NH 03839

NHDES SWF PERMIT NO.: DES-SW-SP-95-001

PHONE NUMBERS: 603/330-2197 (General Number)
800/379-2783 (Special Waste only)

PRINCIPAL CONTACTS:

Alan Davis	District Manager	603/330-2166
Bill Howard, P.E.	District Engineer	603/330-2105
Ellen Bellio	Technical Manager	603/330-2170

PARENT CORPORATION: Waste Management, Inc.
1001 Fannin Street, Suite 4000
Houston, TX 77002

FINANCIAL INFORMATION

FORM OF MANAGEMENT: Corporation

DUNN & BRADSTREET NUMBER: 04577416 (prior to merger with USA Waste)
Annual Report or SEC Form 10K available upon request.

ADMINISTRATIVE INFORMATION

KEY ENVIRONMENTAL PERSONNEL:

The following is a summary of the qualifications of key facility personnel involved in the environmental management of wastes:

Alan Davis.: District Manager – As District Manager, Mr. Davis is responsible for the day to day operation of the WMNH-TREE facility. Prior to becoming District Manager, he served as Site Manager for Waste Management's CWM Chemical Services in Model City, NY and has held various management positions with Waste Management throughout the Northeast. Mr. Davis holds a BT in Civil/Environmental Engineering and is a Grade IV NH DES Certified Solid Waste Operator.

Bill Howard, P.E.; District Engineer - As District Engineer for WMNH-TREE, Mr. Howard is responsible for assisting with site engineering and for environmental compliance activities associated with ensuring that the facility is operated in compliance with all applicable statutes and regulations as well as company policies and procedures. Mr. Howard holds a BS in Civil Engineering and an MS in Environmental Engineering. He is also a registered Professional Engineer, a Certified Hazardous Materials Manager (CHMM), and a Grade IV NH DES Certified Solid Waste Operator.

REGULATORY INFORMATION

EPA Identification Numbers: NHD980914634 (WMNH-TREE as a generator)
NHD510014210 (WMNH-Gas Recovery Facilities as a generator)

APPLICABLE OPERATING PERMITS

Turnkey Landfill of Rochester - I (TLR-I):

Permit Description	Issuing Agency	Permit Number	Issue Date
Sanitary Landfill	Dept. of Public Health		June 21, 1979
Landfill Expansion	Dept. of Public Health		August 3, 1981
Vertical Expansion	DES Waste Management Division	DES-SW-87-023	June 23, 1987
Phase III Modification	DES Waste Management Division	DES-SW-87-024	July 21, 1988
Groundwater Release Detection	DES Water Supply & Pollution Control	GWP-198706010-R-002	October 13, 1997

Turnkey Landfill of Rochester - II (TLR-II):

Permit Description	Issuing Agency	Permit Number	Issue Date
Secure Solid Waste Landfill	DES Waste Management Division	DES-SW-88-019	June 14, 1988
NPDES Storm Water General Permit	US Environmental Protection Agency	NHR05A534	March 21, 2001
Groundwater Release Detection	DES Water Supply & Pollution Control	GWP-198706006-R-003	July 8, 1998

TLR-III Refuse Disposal Facility (TLR-III RDF):

Permit Description	Issuing Agency	Permit Number	Issue Date
Wetlands Board Permit	DES Wetlands Board	93-750	August 31, 1993
Site Specific	DES Water Supply & Pollution Control	WPR-4179-C	April 28, 2000
Solid Waste Management Facility	DES Waste Management Division	DES-SW-SP-95-001	April 10, 1995
NPDES Storm Water General Permit	US Environmental Protection Agency	NHR05A534	January 28, 2001
Groundwater Release Detection	DES Water Supply & Pollution Control	GWP-198706010-R-002	October 13, 1997

Gas Recovery Facility I:

Permit Description	Issuing Agency	Permit Number	Issue Date
Flare #1	DES Air Resources Division	PO-BP-2545	May 18, 1998
Engine #1	DES Air Resources Division	PO-B-1821	May 18, 1998
Engine #2	DES Air Resources Division	PO-B-1822	May 18, 1998
Engine #3	DES Air Resources Division	PO-B-1823	May 18, 1998
Engine #4	DES Air Resources Division	PO-B-1824	May 18, 1998
Flare #2	DES Air Resources Division	PO-B-1927	May 18, 1998
Flare #3	DES Air Resources Division	TP-B-0482	November 26, 2001
Flare #4	DES Air Resources Division	TP-B-0487	August 22, 2002

Gas Recovery Facility II:

Permit Description	Issuing Agency	Permit Number	Issue Date
Turbine #1	DES Air Resources Division	PO-B-2010	April 2, 2001
Turbine #2	DES Air Resources Division	PO-B-2001	April 2, 2001

TREE (Facility-wide):

Permit Description	Issuing Agency	Permit Number	Issue Date
Facility VOC Emissions Permit	DES Air Resources Division	PO-BP-2727	October 25, 1996

Leachate Treatment Plant:

Permit Description	Issuing Agency	Permit Number	Issue Date
Industrial Discharge Agreement	City of Rochester, Dept. of Public Works	RIDA 00-015	January 1, 2001

ENVIRONMENTAL REGULATORY CONTACTS

Solid Waste Permitting:	Michael Guilfoy, P.E.	NH Department of Environmental Services Waste Management Division Permitting and Design Review Section 603/271-6467
Groundwater Quality:	Rebecca Lawrence	NH Department of Environmental Services Water Supply and Pollution Control Division Groundwater Protection Bureau 603/271-6573

Air Quality:	Elizabeth Nixon	NH Department of Environmental Services Air Resources Division 603/271-0883
	Michele Andy	603/271-6793
Industrial Discharge:	David Green	City of Rochester Department of Public Works 603/332-8950

ENVIRONMENTAL COMPLIANCE STATUS

Neither Waste Management of New Hampshire, Inc. - Turnkey Recycling & Environmental Enterprise (WMNH-TREE) nor any of its employees have been charged with an environmental regulatory violation, non-compliance with any permit, or been fined within the last 10 years. There is no existing or pending litigation involving WMNH-TREE or its employees. There are no current or pending regulatory actions by federal, state, or local environmental officials alleging non-compliance with existing environmental regulations.

FACILITY DESCRIPTION

LOCATION:

T.R.E.E. is located in the City of Rochester, Strafford County, New Hampshire on Rochester Neck Road approximately 1 mile southwest of the intersection of Rochester Neck Road and Route 125.

TOTAL ACREAGE:

Approximately 1,216+/- acres

ACRES DEDICATED TO WASTE MANAGEMENT:

TLR-I (closed) - 49 acres
TLR-II (closed) - 51 acres
TLR-III RDF (active) - 106 acres
Liquid Solidification located within the TLR-III RDF.

METHOD OF WASTE DELIVERY:

Wastes materials are accepted at T.R.E.E. via:

Roll -off containers	Tankers (for liquids)
Dump trucks	Vacuum trucks
Dump trailers	Drums (for solids and liquids)
Box vans	Other miscellaneous non-bulk containers

Note: This list is not all inclusive. Contact WMNH-TREE if you have any questions regarding the acceptability of a particular type container.

SITE HISTORY:

The property which now encompasses WMNH-TREE was formerly used for agricultural purposes, for sand and gravel operations or was undeveloped. Solid waste disposal activities began at this site in 1979 with the construction and operation of the TLR-I Landfill, which was the first lined landfill permitted in the State of New Hampshire. Waste Management acquired TLR-I Landfill in 1983. TLR-I was filled and the final cover system completed in October 1992.

In 1988, the TLR-II Landfill was permitted with a double 60 mil HDPE liner system which also incorporated a geocomposite clay liner (GCL) in the primary liner system. TLR-II began operations in 1990. TLR-II was filled and the final cover system completed in September 1997.

In 1995, the TLR-III Refuse Disposal Facility was also permitted with a double 60 mil HDPE liner system with a GCL component to the primary liner system. The

TLR-III RDF began operations in 1995, and will be able to accept waste until the year 2012.

Ancillary facilities include a material recovery facility, leachate treatment plant (completed in 1991), and two landfill gas recovery facilities (plants began operation in 1992 and 1997, respectively).

FACILITY HOURS OF OPERATIONS:

The landfill is opened to the general public during the following hours:

8:00 a.m. - 3:30 p.m.	Weekdays
8:00 a.m. - 11:30 p.m.	Saturdays

Asbestos Disposal (by appointment only):

7:00 a.m. - Noon	Tuesday-Friday

Solidification (by appointment only):

7:00 a.m. - Noon	Monday-Friday

SITE ACCESS:

Access to the TLR-III RDF is gained through a site entrance and gate located on the north side of Rochester Neck Road. All traffic must enter and exit by way of the TLR-III RDF scale house. Access to the perimeter of the landfill facilities is restricted by a 6-foot fence with gates located on the access road to the scale house. The gates and scale house are monitored during operating hours and locked at night or whenever the landfill is closed.

SPECIAL WASTE RECEIVING PROCEDURES:

All special wastes are pre-approved prior to acceptance at this facility (see Special Waste Approval Procedures). Customer, generator and waste stream information is maintained in the facility's scale system. Most special wastes are not required to be scheduled prior to shipment. Shipments of asbestos and liquid wastes requiring solidification, however, must be scheduled prior to disposal.

When a transporter delivers a special waste stream to the TLR-III RDF, the gate attendant will determine the nature of the special wastes by asking the generator or transporter the following questions:

What is in this load?
What are you hauling?
Where is the load from?
Who generated the waste?
Has this waste material been previously approved for this site?

The hauler is also required to sign the weight slip which states "To the best of my knowledge this truck contains no hazardous or unacceptable waste". Unapproved special waste will be rejected and the procedures to receive approval (if acceptable) will be initiated.

PROJECTED SITE LIFE:

Disposal capacity will be available at the TLR-III RDF until the year 2012.

ACTIVE FACILITY OPERATIONS:

TLR-III Refuse Disposal Facility - Subtitle D landfill for the disposal of non-

hazardous wastes.

Liquid Waste Solidification - solidification of non-hazardous liquid wastes so that it no longer contains free liquids. Solidified wastes are disposed at the TLR-III RDF.

Material Recovery Facility (MRF) - recycling facility for the sorting and processing of up to 150 tons per day of recyclables materials (glass, aluminum, plastics, ferrous metals).

Leachate Treatment Facility - on-site pretreatment of up to 60,000 GPD of landfill leachate prior to discharge to the City of Rochester POTW.

Landfill Gas Recovery Facilities - 2 facilities which utilize landfill gas for the production of electricity. One plant consists of 4 reciprocating engines generating 800 kW each. The second plant includes 2 stationary gas turbines generating approximately 3.2 MW each.

WASTE TYPES MANAGED:

Acceptable Wastes:

- Municipal solid waste;
- construction and demolition debris;
- ash from incineration of municipal solid waste and medical/infectious waste;
- asbestos waste;
- sludge and septage solids;
- waste from industrial processes;
- waste from pollution control devices;
- residue from a spill of a non-hazardous chemical substance or commercial product:
- commercial products which are off-spec., outdated, or unused;
- waste produced from the demolition or dismantling of industrial equipment or facilities contaminated from the industrial process; and
- contaminated soils.

Prohibited Wastes:

- Hazardous waste as defined under federal law and the New Hampshire Hazardous Waste Rules
- polychlorinated biphenyls regulated under TSCA;
- CFCs;
- untreated medical or infectious waste;
- contained or free liquid wastes;
- contained gaseous wastes; and
- source, special nuclear or by-product material as defined by Atomic Energy Act of 1954, as amended.

SPECIAL WASTE APPROVAL PROCEDURES:

WMNH has established a special waste management program in an effort to identify the non-hazardous waste streams which require special management and to preclude the disposal of unacceptable materials.

The first step of special waste management is the identification of special wastes produced by our customers. The initial screening of waste streams generated by commercial or industrial customers is conducted by the WMNH's District Engineer, Approvals Coordinator, or company sales representatives. Special waste customers must complete a Generator's Waste Profile Sheet which characterizes the waste to be disposed.

Requests for approval are reviewed by the Technical Manager. The Technical Manager then approves the waste stream with or without special conditions for

the management of the waste or denies approval.

In addition, waste streams of existing customers are also periodically reviewed. This review may involve site visits, load inspections, or the re-examination of special waste management decisions.

SITE CHARACTERISTICS

SURROUNDING LAND USE:

The land immediately surrounding the active landfill (i.e. TLR-III Refuse Disposal Facility) in owned by Waste Management. Other facilities include the TLR-I and TLR-II Landfills (both closed), a Material Recovery Facility (MRF), a leachate treatment plant, and 2 gas recovery (electrical generation) plants. Maintenance garages and a truck wash facility are located on-site. An active borrow area is located to the north of TLR-I. Residential properties along Rochester Neck Road are owned by Waste Management.

The landfill facilities and vicinity are zoned by the City of Rochester as Industry 4 (I-4). Permitted uses in this zone include industrial uses and solid waste management facilities including landfills and related ancillary activities.

HYDROGEOLOGIC CONDITIONS:

Based upon the extensive data base of hydrogeologic conditions at and in the vicinity of the TLR-III RDF, groundwater and surface water protection standards including minimum vertical separation from seasonal high groundwater table and bedrock; setback requirements from surface water bodies and other natural features; and other landfill siting limitations relating to geologic conditions are readily satisfied.

NEAREST SURFACE WATERS:

The waste management facilities at this site are bordered on the northeast by the Cocheco River and to the southwest by the is Isinglass River.

FLOODING:

No portion of WMNH-TREE's waste management operations are located within the 100 year flood plain.

ENVIRONMENTAL MONITORING:

Leachate Monitoring - The TLR-III RDF liner system consists of a double geosynthetic liner with primary and secondary leachate collection and removal systems. The amount of leachate removed from the primary and secondary collection systems from each phase of the landfill is monitored by recording daily readings from flow meters. Leachate quality is monitored by collecting representative samples of leachate from each phase three times a year and the secondary collection system on an annual basis for analysis.

Landfill Gas Monitoring - Landfill gas monitoring is conducted to monitor methane levels between the limit of refuse and property lines as well as within adjacent on-site occupied structures. Gas monitoring consists of monitoring permanent gas probes and continuous monitors installed within occupied structures adjacent to the disposal area.

Groundwater Monitoring - Permanent groundwater monitoring wells are installed around the perimeter of the landfill facilities to monitor groundwater quality at the site in accordance with the facility's Groundwater Release Detection Permit. Samples are collected two times per year using EPA-approved protocols and analyzed for indicator parameters. During groundwater monitoring, the depth to groundwater is also measured.

Turnkey Recycling & Environmental Enterprises

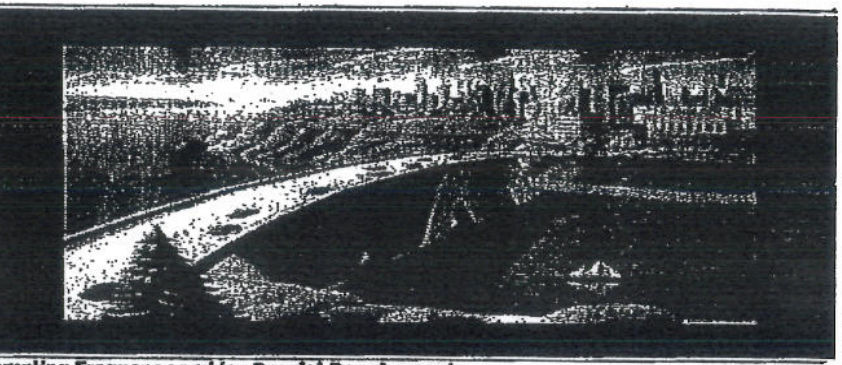
APPROVAL CRITERIA

The following sampling analysis should be conducted according to *"Test Methods of Evaluating Solid Waste,"* (SW846) for disposal at our facility by the following methods:

ANALYSIS REQUIRED	ANALYTICAL METHOD	ACCEPTANCE LIMIT
Ignitability / Flashpoint	EPA Method 1010, 1020A, 1030	Not ignitable per 40 CFR Part 261.21
Corrosivity / pH	EPA Method 9045C	Greater than 2 and less than 12.5
Reactive Sulfide	SW 846 7.3.4.1	Not reactive per NH Hazardous Waste Rules Env-Wm 403.05(b)
Reactive Cyanide	SW 846 7.3.3.2	Not reactive per NH Hazardous Waste Rules Env-Wm 403.05(b)
TCLP Volatile Organic Compounds (VOC's)	Preparation: EPA Method 1311 Analysis: EPA Method 8260B	EPA regulated TCLP thresholds as specified in 40 CFR Part 261.24 Table I
TCLP Semi-Volatile Organic Compounds (SVOC's)	Preparation: EPA Method 1311 Analysis: EPA Method 8270C	EPA regulated TCLP thresholds as specified in 40 CFR Part 261.24 Table I
Total Polychlorinated Biphenyls (PCB's)	EPA Method 8082	Non-TSCA regulated
TCLP Arsenic	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7060A,7061A	<5 mg/L
TCLP Barium	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7080A, 7081	<100 mg/L
TCLP Cadmium	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7130, 7131A	<1 mg/L
TCLP Chromium	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7190, 7191	<5 mg/L
TCLP Lead	Preparation: EPA Method 1311 Analysis: EPA Method 6010B. 7420, 7421	<5 mg/L
TCLP Mercury	Preparation: EPA Method 1311 Analysis: EPA Method 7470A, 7471A, 7472	<0.2 mg/L
TCLP Selenium	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7741A, 7742	<1 mg/L
TCLP Silver	Preparation: EPA Method 1311 Analysis: EPA Method 6010B, 7760A, 7761	<5 mg/L
TCLP Chlordane	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<0.03 mg/L
TCLP Endrin	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<0.02 mg/L
TCLP Heptachlor (and its epoxide)	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<0.008 mg/L
TCLP Lindane	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<0.4 mg/L
TCLP Methoxychlor	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<10 mg/L
TCLP Toxaphene	Preparation: EPA Method 1311 Analysis: EPA Method 8081A	<0.5 mg/L
TCLP 2,4-D	Preparation: EPA Method 1311 Analysis: EPA Method 8151A	<10 mg/L
TCLP 2,4,5-TP (Silvex)	Preparation: EPA Method 1311 Analysis: EPA Method 8151A	<1 mg/L

The parameters required for initial testing may be modified based on the "generator's knowledge" (i.e., documented knowledge of the materials or processes used to generate the waste, source of contamination, site history). The frequency or parameters required for periodic testing may also be modified (increased or decreased) based on the volume of waste generated, historic analytical data, as well as written "generator's knowledge."

ANALYTICAL REQUIREMENTS
Waste Management of NH
Turnkey Recycling & Environmental Enterprises
P.O. Box 7065/ 30 Rochester Neck Road
Rochester, New Hampshire 03839-7065
Phone: 800/379-2783
Fax: 603/330-2130



	TCLP Metals (1311)	TCLP Volatiles (1311)	TCLP Semi-Volatiles (1311)	TCLP Pesticides (1311)	TCLP Herbicides (1311)	Total PCB's (8082)	Ignitability/Flashpoint (1010,1020A)	Corrosivity/pH (9045C)	Reactive Sulfide (7.3.4.1)	Reactive Cyanide (7.3.4.2)	Total Hexavalent Chromium (7198)	Total Trivalent Chromium	Total Petroleum Hydrocarbons (8100)	Free Liquids/Paint Filter (9095A)	Asbestos (Polarized Light Microscopy)	Sampling Frequency and/or Special Requirements
Ash																
Fossil Fuel Boiler Ashes	X							X								Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Wood/Biomass Boiler Ash	X							X								Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Open Burn Ashes	X							X								Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
MSW Incinerator Ash	X							X								Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Infectious Waste Incinerator Ash	X							X								Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Contaminated Soil and Debris																
Gasoline Contaminated Soil and Debris	Pb	X					X						X			For metals, only TCLP lead is required. Waste must not be saturated- no free oil.
Used Oil Contaminated Soil and Debris	X	X	X			X	X	X	X	X			X			Waste must not be saturated. No free oil. WM cannot accept state regulated waste including NH01 or MA01.
Virgin Petroleum Contaminated Soil and Debris	X	X					X						X			DES virgin spill report & certification stating that virgin petroleum is the only source of contamination required.
Urban Fill Type Contaminated Soil and Debris	X	X	X	X	X	X	X	X	X	X						Frequency- 1 sample per 250 tons up to 1000 tons. If >1000 tons, one sample per 500 with a minimum of four.
Sludge																
Alum Sludge	X							X						X		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Car Wash Sludge	X	X						X					X	X		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Latex Sludge	X	X												X		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Laundry Sludge	X	X				X		X					X	X		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Leather Sludge	X	X						X			X	X		X		Acceptability per Env-Wm 401.03(b)(5) and 40 CFR 261.4(b)(6)(i).
POTW Sludge	X	X	X											X		No free liquids for direct disposal. Generator must provide odor control as necessary.
Grit																
POTW Grit/Screenings														X		No free liquids for direct disposal. Generator must provide odor control as necessary.
Sandblast Grit	X															Other parameters may be applicable depending on coating and surface to be blasted.
Catch Basin Grit / Sewer Grit	X	X				X							X	X		Other parameters may be applicable depending on potential discharges to the catch basin/sewer pipe.
Miscellaneous																
Auto Fluff / Auto Shredder Residue	X	X	X			X										Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Coal Tar / MGP Derived Wastes	X	X	X			X										Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Landfill Leachate	X	X	X	X	X	X	X	X	X	X					X	Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Leather Scraps	X										X	X				Acceptability per Env-Wm 401.03(b)(5) and 40 CFR 261.4(b)(6)(i). TCLP Hexavalent Chromium <1 mg/L.
Oily Solids / Oily Rags	X	X	X			X	X						X			Must not be a state regulated waste. No free liquids.
Street Sweepings	X	X				X										Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Wood Chips / C&D Fines	X		X												X	Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Other Non-Hazardous Special Wastes	X	X	X	X	X	X	X	X	X	X						Parameters determined based on generator knowledge of the process generating the waste, site history, etc.

Last Revision- 6/26/2003

SPECIAL WASTE PROGRAM

GOAL:
The goal of the special waste program is to provide secure landfill disposal options to our customers while ensuring that we operate in full compliance with our solid waste permits. The special waste program was implemented in an effort to identify suitable non-hazardous wastes as well as reliably screen out unacceptable wastes.

APPROVAL PROCESS:
All special wastes require pre-approval. Customers and generators of special wastes may submit an approval package to the special waste department to be considered for disposal. This approval package typically consists of a Generator's Waste Profile Sheet, a Waste Stream Questionnaire, and any applicable Material Safety Data Sheets or analytical data. The profile package is reviewed by the Technical Manager, at which time it may be approved, with or without conditions. If additional information is needed to make a non-hazardous waste determination, the customer will be contacted with specific questions or requests.

Once a waste has been approved for disposal, a copy of the approval is provided to the customer. A standard condition of approval on all profiles is that a Service Agreement must be executed prior to acceptance of the waste. Since special waste types vary significantly, each separate project is priced individually with special consideration given to the density and volume of material to be disposed of.

With the profile approval and Service Agreement in place, profile information is entered into the facility's scale system. All information is specific to the profile number and ties all relevant project information together. Examples of this information include customer billing information, generator information, waste type, pricing, maximum tonnage, periodic testing requirements, etc. For this reason it is very important that all transporters are able to identify the waste they are carrying by its profile number. Profile numbers must be identified on all shipping documentation.

TYPICAL ACCEPTABLE WASTES:
The following are examples of non-hazardous wastes typically permitted for disposal at Turnkey:

- Municipal Solid Waste (MSW)
- Construction & Demolition Debris (C&D)
- Ash from the Incineration of MSW, Fossil Fuels, Wood, Medical Waste
- Asbestos Containing Materials
- Municipal Wastewater Treatment Sludge
- Catch Basin Grit, Sewer Grit, Sandblast Grit
- Off-specification, Outdated or Unused Commercial Chemical Products
- Contaminated Soils
- Creosote Treated Wood
- Wood Chips, C&D Fines
- Drummed Wastes
- Industrial Process Wastes
- Leather Wastes
- Pulp & Papermill Sludges
- Agricultural/Organic Wastes
- Treated Medical Waste
- Liquid Wastes
- Decharacterized Soils

TYPICAL PROHIBITED WASTES:
The following are examples of hazardous wastes prohibited from landfill disposal at Turnkey:

- Hazardous Wastes as defined under Federal and State Law
- Polychlorinated Biphenyls (PCB's) Regulated under TSCA (generally > 50 parts per million)

- Chlorofluorocarbons (CFC's)
- Untreated Medical or Infectious Wastes
- Contained Gaseous Wastes
- Source, Special Nuclear or By-Product Material as Defined by Atomic Energy Act of 1954, as Amended

SCHEDULING:
It is a good practice to call the day before so that we can verify that your profile is active and up-to-date. Most trucks delivering special wastes offload directly onto the working face of the landfill. However, trucks carrying asbestos, drummed wastes, liquid wastes for solidification, or contaminated soil MUST be scheduled in advance. Since these materials require special handling, advance notice allows us to alert our operations crew that these wastes are expected. Having the appropriate equipment and manpower available when your load arrives will prevent delays and help to ensure that your waste is managed properly.

SHIPPING DOCUMENTATION:
All asbestos loads are required to be accompanied by a Waste Shipment Record. Other special wastes are required by site policy to be transported on a Bill of Lading, Non-Hazardous Special Waste Manifest, Material Shipping Record, or equivalent. Please note that Turnkey is not permitted to receive hazardous wastes and therefore does not terminate Uniform Hazardous Waste Manifests. NO HAZARDOUS WASTE MANIFESTS WILL BE SIGNED AT THE FACILITY.

FREQUENTLY ASKED QUESTIONS:
Who do I contact for special waste pricing or profiling information? We recommend that you contact us by calling our toll-free customer service number 800-379-2783. (1-800-DR-WASTE) Typically you will reach the Approvals Coordinator, who can assist you by answering customer service questions, or by taking your information and having a sales representative call you back for pricing inquiries.

Where do I send the approval package? You may mail the package to Attn: Special Waste Department, Waste Management of NH, PO Box 7065, Gonic NH 03839 or sent it to us via facsimile at 603-330-2130.

How long does it take to get an approval? Turn around time for an approval depends on the completeness of the approval package. To expedite a quick decision, please send all relevant information together (including Generator's Waste Profile Sheet, Waste Stream Questionnaire, MSDS's if applicable, analytical testing, etc.). Most delays are the result of missing paperwork. Complete packages meeting our acceptance criteria will be approved for shipping the next day.

Why does Waste Management require that the generator sign the Generator's Waste Profile Sheet? Can I sign it on behalf of my client? The generator of the waste is ultimately responsible for characterizing their waste properly and managing it appropriately. By providing waste stream information and responding to critical certification questions, the generator is providing Waste Management with assurance that the information is accurate and complete. The exception to this is if a generator provides a written authorization which states that a specific individual or company may act as its agent and sign on its behalf.

Can I use any laboratory for analytical testing? Analytical results must come from a state-certified laboratory. Please provide the full report, including the Chain of Custody and the Quality Assurance / Quality Control portion. If only certain samples are relevant to the waste being profiled, please specify this in writing.

What sampling frequency is required? The most critical element in sampling is collecting a representative sample. Sampling techniques and methods should be in accordance with SW-846 "Test Methods for Evaluating Solid Waste". For characterizing fairly homogeneous wastes, we require the following frequency for guidance for material to Turnkey:

One representative sample per every 250 tons (for projects with a total volume <1000 tons)
One representative sample per every 500 tons, with a minimum of four samples (for projects with a total volume >1000 tons)

What parameters do I need to test for? The parameters may vary from project to project, depending on the process generating the waste, site history, etc. The attached spreadsheet is provided for reference only- "Turnkey Typical Testing Requirements".

What are the acceptance criteria for disposal at Turnkey? The waste must be non-hazardous per federal regulations and per NH state rules. Turnkey cannot receive wastes generated outside New Hampshire that are regulated as hazardous wastes in their state of origin. Please refer to the attached chart "Turnkey Approval Criteria" for information.

Who do I call to schedule loads? Please contact our Approvals Coordinator, Victor Rivera at 800-379-2783, or fax the attached "Scheduling Sheet" to us at 603-330-2130. Please note: ALL LIQUIDS MUST BE SCHEDULED IN WRITING A MINIMUM OF 24 HOURS IN ADVANCE.

What do I do if my waste contains free liquids? Wastes containing free liquids are not permitted to be dumped directly in the landfill. However, Waste Management does have the ability to solidify liquid waste or solid waste containing free liquid on site at Turnkey. Non-hazardous liquids and semi-solids are offloaded into an 11,000 gallon steel pit. Amendment is used as a bulking agent to absorb liquids. The materials are mixed together with an excavator. Once enough amendment has been added to eliminate all free liquids, the material is excavated from the pit, loaded into a dump truck, and placed in the landfill for final disposal.

What should my driver expect upon arrival at the landfill? Transporters must be knowledgeable about the material they are hauling for their safety and the safety of others. The gate attendant will determine the nature of the special waste by asking the transporter the following questions:
What type of waste are you hauling?
Who is the generator of the waste?
From where did the load originate?
What is the profile approval number for this waste?
The scale attendants will examine the shipping documentation and enter the applicable waste profile number in the facility's scale system. The scale system will only allow access to profiles that are approved and current. Any profile that has expired, exceeded its tonnage limit, is overdue for periodic testing, or is not approved will not be allowed access to the landfill. If the profile is current and active, the truck is weighed and the driver proceeds down the access road to the spotter. The spotter will confirm the contents of the load with the driver, and direct him/her to the appropriate disposal area. Hardhats are required at all times while in the landfill. Any driver within fifty feet of the asbestos area must have a fit-tested NIOSH-approved respirator with HEPA filter for protection. After offloading, the transporter will return to the scalehouse to record the empty weight of the truck. A weight ticket indicating the truck's gross, tare and net weight will be given to the driver for signature. The signature of the driver certifies the following: "I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE." The ticket and signed shipping document is returned to the driver. Copies of all paperwork are maintained at the facility.

If you have any questions or would like more information about the Special Waste Program, please don't hesitate to contact us at 800-379-2783.

MARSH USA INC.

CERTIFICATE OF INSURANCE

CERTIFICATE NUMBER
HOU-000404903-00

PRODUCER
MARSH USA, INC.
THANKSGIVING TOWER
1601 ELM STREET
SUITE 2100
DALLAS, TX 75201
Attn: Stephanie Story
—02-04 WMR

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER OTHER THAN THOSE PROVIDED IN THE POLICY. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES DESCRIBED HEREIN.

COMPANIES AFFORDING COVERAGE

COMPANY A: AMERICAN INTERNATIONAL SPECIALTY LINES INS CO

COMPANY B:

COMPANY C:

COMPANY D:

INSURED
Waste Management of NH-Turnkey
Recycling & Environmental Enterprises
a division of Waste Management, Inc.
18 Turnkey Way
PO Box 7065
Rochester, NH 03839

COVERAGES This certificate supersedes and replaces any previously issued certificate for the policy period indicated above.

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE DESCRIBED HEREIN HAVE BEEN ISSUED TO THE INSURED NAMED HEREIN FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THE CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, CONDITIONS AND EXCLUSIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
	GENERAL LIABILITY				GENERAL AGGREGATE	$
	☐ COMMERCIAL GENERAL LIABILITY				PRODUCTS - COMP/OP AGG	$
	☐ CLAIMS MADE ☐ OCCUR				PERSONAL & ADV INJURY	$
	☐ OWNER'S & CONTRACTOR'S PROT				EACH OCCURRENCE	$
					FIRE DAMAGE (Any one fire)	$
					MED EXP (Any one person)	$
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT	$
	☐ ANY AUTO				BODILY INJURY (Per person)	$
	☐ ALL OWNED AUTOS				BODILY INJURY (Per accident)	$
	☐ SCHEDULED AUTOS				PROPERTY DAMAGE	$
	☐ HIRED AUTOS					
	☐ NON-OWNED AUTOS					
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	$
	☐ ANY AUTO				OTHER THAN AUTO ONLY:	
					EACH ACCIDENT	$
					AGGREGATE	$
	EXCESS LIABILITY				EACH OCCURRENCE	$
	☐ UMBRELLA FORM				AGGREGATE	$
	☐ OTHER THAN UMBRELLA FORM					$
	WORKER'S COMPENSATION AND EMPLOYER'S LIABILITY				☐ WC STATUTORY LIMITS ☐ OTHER	
	THE PROPRIETOR/ PARTNER/EXECUTIVE OFFICERS ARE: ☐ INCL ☐ EXCL				EL EACH ACCIDENT	$
					EL DISEASE-POLICY LIMIT	$
					EL DISEASE-EACH EMPLOYEE	$
A	OTHER Pollution Legal & Environmental Impairment Liab	PLS 619 1671 'Claims Made & Reported Form'	01/01/02	01/01/04	Each Incident Limit	10,000,000
					Aggregate Limit	20,000,000
					SELF - INSURED RETENTION EACH INCIDENT	5,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS (LIMITS MAY BE SUBJECT TO DEDUCTIBLES OR RETENTIONS)

CERTIFICATE HOLDER

"FOR BID PURPOSES ONLY"

CANCELLATION

SHOULD ANY OF THE POLICIES DESCRIBED HEREIN BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE INSURER AFFORDING COVERAGE WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED HEREIN, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER AFFORDING COVERAGE, ITS AGENTS OR REPRESENTATIVES.

MARSH USA INC.
By: Stephanie S. Story

CERTIFICATE OF INSURANCE

Date: (MM/DD/YY) 12/21/2002

PRODUCER
Lockton Insurance Agency of Houston, Inc.
5847 San Felipe, Suite 320
Houston, TX 77057
866-260-3538 (Phone)
866-492-1055 (Fax)

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED: WASTE MANAGEMENT, INC. and

Waste Management
PO Box 7065
18 Turnkey Way
Rochester, NH 03839

INSURERS AFFORDING COVERAGE	
Insurer A:	ACE American Insurance Company
Insurer B:	Indemnity Insurance Company of North America
Insurer C:	
Insurer D:	
Insurer E:	

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY BE EXHAUSTED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	EFFECTIVE DATE	EXPIRATION DATE	LIMITS	
	GENERAL LIABILITY	HDO G2058693A	1/1/2003	1/1/2004	EACH OCCURRENCE	$ 5,000,000
A	X COMMERCIAL GENERAL LIABILITY				FIRE DAMAGE (ANY ONE FIRE)	$ 5,000,000
	X OCCURRENCE				MED EXP (PER PERSON)	
	X XCU INCLUDED				PERSONAL & ADV INJURY	$ 5,000,000
	X ISO FORM CG 00 01 10 01				GENERAL AGGREGATE	$ 6,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:				PRODUCTS/COMP. OP. AGG	$ 6,000,000
	X PROJECT					
	X LOCATION					
	AUTOMOBILE LIABILITY	ISA H07840263	1/1/2003	1/1/2004	COMBINED SINGLE LIMIT (EACH ACCIDENT)	$ 10,000,000
A	X ANY AUTO					
	ALL OWNED AUTOS					
	X HIRED AUTOS					
	X NON-OWNED AUTOS					
	X MCS-90					
	EXCESS LIABILITY/UMBRELLA	XOOG21740019	1/1/2003	1/1/2004	EACH OCCURRENCE	$ 15,000,000
A	X OCCURRENCE				AGGREGATE	$ 15,000,000
	CLAIMS MADE					
	WORKERS' COMPENSATION	WLR C43510885 SCF C43510927 (WI)	1/1/2003	1/1/2004	WORKERS' COMPENSATION	STATUTORY
B	and EMPLOYERS LIABILITY				EL EACH ACCIDENT	$ 1,000,000
A					EL DISEASE-EA EMPLOYEE	$ 1,000,000
					EL DISEASE-POLICY LIMIT	$ 1,000,000

REMARKS: DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT PROVISIONS:

CHECK BOX
☒ BLANKET WAIVER OF SUBROGATION IS GRANTED IN FAVOR OF CERTIFICATE HOLDER ON ALL POLICIES WHERE AND TO THE EXTENT REQUIRED BY WRITTEN CONTRACT.
☒ CERTIFICATE HOLDER IS NAMED AS AN ADDITIONAL INSURED (EXCEPT FOR WORKERS' COMP/EL) WHERE AND TO THE EXTENT REQUIRED BY WRITTEN CONTRACT.

CERTIFICATE HOLDER:

"For Bid Purposes Only"
c/o Waste Management

CANCELLATION:

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES. EXCEPT 10 DAYS NOTICE FOR NON-PAYMENT.

AUTHORIZED REPRESENTATIVE